

October 8, 2015

Victoria Wachino, Director
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
200 Independence Avenue Southwest
Washington, DC 20201

Dear Ms. Wachino,

Subject: Washington State's 1115 Medicaid Transformation Waiver Application

Opportunity Council is a Community Action Agency serving the northwest region of Washington. The services we offer to assist low-income families move out of poverty include early learning, housing support, food access, energy assistance, financial stability, and weatherization and home repair.

On behalf of Opportunity Council, I am writing to express our strong support for the Supportive Housing Medicaid benefit proposed in Washington State's 1115 Medicaid Transformation Waiver application to the federal Centers for Medicare and Medicaid Services. I am also writing to encourage CMS to consider incorporating in the menu of new interventions two innovative housing services that improve the health of children who are diagnosed with asthma.

Supportive Housing Medicaid Benefit

Supportive housing is a nationally recognized evidence-based best practice for serving people who are chronically homeless and have serious behavioral and/or physical health disabilities. In the three counties we serve in the North Sound region of Washington, people who are chronically homeless experience disproportionate health disparities. As a result, this population – in a state of homelessness – imposes high costs to public systems, including Medicaid, due to frequent utilization of public crisis services, emergency department, and hospitalizations.

There is a critical shortage of funding for the housing support services that are critical to the model's success. A Supportive Housing Medicaid benefit will bring much needed resources for supportive housing services that will help make the expansion of this intervention financially feasible. In the region we serve, organizations that provide supportive housing often lack the financial resources to provide the necessary outreach and tenancy support services to adequately serve the number of chronically homeless people that are cycling repeatedly in and out of our hospitals for emergency department visits and inpatient stays. Often, the lack of funding for supportive services is the determining factor that prevents a new supportive housing program from moving forward. This benefit will help fill a significant gap in our continuum of care for people who are seriously ill and for whom we often cannot provide services due to the lack of supportive service funding.

Community Action

A Community Action Agency
serving Whatcom, Island and
San Juan Counties since 1965

Whatcom County
1111 Cornwall Ave., Suite C
Bellingham, WA 98225
(360) 734-5121
(800) 649-5121
Fax (360) 671-0541

Island County
1791 NE 1st Ave.
P.O. Box 922
Oak Harbor, WA 98277
(360) 679-6577
(800) 317-5427
Fax (360) 679-2440

San Juan County
(800) 649-5121

Page Two
Victoria Wachino, Director
October 8, 2015

Healthy Homes and Weatherization Plus Health

Since 2003 we have been delivering two innovative programs in our region that we recommend be incorporated into the Global Medicaid Waiver demonstration menu of allowable interventions. Both programs target families with a child in the household that has been diagnosed with asthma.

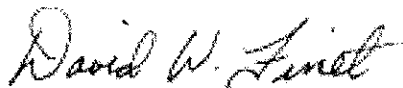
The first program, *Healthy Homes*, performs an environmental risk assessment to identify known asthma triggers in the indoor environment. The program also offers a comprehensive education component focusing on what behavior changes can be made to mitigate or reduce exposure.

The second program, *Weatherization Plus Health*, builds on the information gathered and the education provided during the *Healthy Homes* risk assessment. Further interventions are performed through the weatherization and home repair programs where improvements to the home's structure, mechanical or ventilation systems are completed to eliminate problems known to exacerbate asthma in sensitive individuals.

Healthy Homes and *Weatherization Plus Health* activities are performed by trained, *Healthy Homes* Specialists, a recognized credential in the *Healthy Homes* field. A recent study of this program conducted by the Department of Energy's Oak Ridge National Laboratory looked at the efficacy of *Healthy Homes* education and *Weatherization Plus Health* and found that visits to urgent care and use of asthma medications by those participating in the program had statistically significant reductions in associated Medicaid expenses. The goals and outcomes of *Healthy Homes* and *Weatherization Plus Health* programs align with the Medicaid Transformation Goals outlined as strong prevention strategies in reducing the use of intensive medical services. (Find the Oak Ridge report here: <http://www.oppeco.org/publications/>)

Thank you for your consideration of Washington's 1115 Medicaid Transformation Waiver application. If approved, this proposal will result in significant savings to Medicaid while ensuring people with serious illness and disabilities are able to live with security, autonomy and dignity in their own communities.

Sincerely,

A handwritten signature in black ink, reading "David W. Finet". The signature is written in a cursive, flowing style.

David W. Finet
Executive Director